

# McKool Smith

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May 18, 2023

By ECF

The Honorable Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 2270  
New York, New York 10007

Re: Stein and Lhote v. Skatteforvaltningen  
23 Civ. 2508 (NRB)

Dear Judge Buchwald:

We write jointly together with Defendant Skatteforvaltningen and consistent with the Court's Order, dated April 24, 2023 (ECF No. 31) with respect to redactions of the Settlement Agreement and related materials.

The parties have now conferred and resolved any disagreements relating to redactions.

The parties jointly propose that those materials be redacted in the form separately filed as Exhibit 3, which shows material proposed to be redacted shaded in yellow.

The changes between Exhibit 3 and the previously proposed versions, Exhibits 1 and 2 to Plaintiff's Memorandum of Law In Response to Order Regarding Continued Sealing of Settlement Agreement, dated Apr. 13, 2023, and Plaintiff's Reply Memorandum of Law (ECF Nos. 27-28, 30) are:

- (1) Information regarding North Channel Bank is no longer redacted in the Letter Agreement and in Annex A to the Letter Agreement.
- (2) Information regarding all parties that were excluded from the releases in the Settlement Agreement and that have been named as defendants in the multidistrict litigation that Defendant has initiated are no longer redacted.
- (3) Information about one of the cases that was initiated by Defendant as part of the multidistrict litigation and that is described in Section 3(a) of the Settlement Agreement is no longer redacted.

Based on the foregoing and as set forth in the parties' prior briefing (ECF Nos. 27-28, 30), Plaintiff submits that the proposed redactions in Exhibit 3 are consistent with *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119 (2d Cir. 2006).

**McKool Smith**

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The parties jointly request that the Court order Plaintiff to file Exhibit 3 in redacted form.

Based on my communications with Robert H. Pees, counsel to Luke McGee, I can represent that he does not object to the proposed redactions.

Respectfully submitted,

/s/

Daniel W. Levy

cc: All Counsel (by ECF)

Plaintiff shall publicly file Exhibit 3 in redacted form within three days of the date of this Order.

SO ORDERED.

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NAOMI REICE BUCHWALD  
UNITED STATES DISTRICT JUDGE

Date: May \_\_\_\_, 2023  
New York, New York